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Ms. Nancy Marconi
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Toronto, ON M4P 1E4

September 1, 2022

**EB-2022-0157 – Panhandle Regional Expansion Project Leave to Construct
Pollution Probe Interrogatoires**

Dear Ms. Marconi:

In accordance with OEB direction, please find attached Pollution Probe's Interrogatories to the Applicant.

Respectfully submitted on behalf of Pollution Probe.

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ONTARIO ENERGY BOARD

**Enbridge Gas Inc.
Panhandle Regional Expansion Project
Leave to Construct**

POLLUTION PROBE INTERROGATORIES

September 1, 2022

**Submitted by: Michael Brophy
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Consultant for Pollution Probe

1-PP-1

Reference: “The Panhandle System is critical to providing safe, reliable, and affordable natural gas to Enbridge Gas’s in-franchise residential, commercial, and industrial customers in the Panhandle Market.” [B/2/1 Pg.1]

- a) Please provide a map showing the area of customers served by natural gas that travels through the Panhandle System.
- b) Please provide a diagram showing the peak inflows (GJ and/or cubic meter) and peak outflows (GJ and/or cubic meter) for the Panhandle System and which systems feed or receive the inflows/outflow.

1-PP-2

Reference: “The facilities, collectively referred to as the Panhandle Regional Expansion Project (“Project”), are required to expand Enbridge Gas’s Panhandle Transmission System (“Panhandle System”), which transports natural gas between Enbridge Gas’s Dawn Compressor Station, ...”. [A/2/1 Page 2]

- a) Please explain the full scope of system analysis conducted on the broader Enbridge Ontario transmission and distribution system with and without the proposed project (e.g. was this included in the Dawn/Storage assessment)
- b) When was the proposed project first identified in the Enbridge Asset Management Plan (AMP)?
- c) Please provide the page references from Enbridge’s most current Asset Management Plan that explains the basis for the project and where it ranks against all other projects in the AMP.

1-PP-3

Reference: “Growth is forecast to occur across the entire Panhandle System with concentration in the Leamington-Kingsville and Windsor areas.

Please provide a copy of all documents and specific information sources outlining the growth assumptions that would affect the Panhandle system as noted above.

1-PP-4

Reference: “Enbridge Gas’s current Panhandle System Design Day demand forecast is developed from the contract demand and customer attachment forecasts.” [A/3/1, Pg. 2]

- a) Please provide a summary of customer numbers by type (e.g. residential, industrial, commercial) currently served by the Panhandle system on a peak day.
- b) Please provide a copy of the Enbridge customer attachment forecast by year from 2023 to 2028 and indicate what portion of the forecast will be served by the Panhandle system.
- c) Does Enbridge have a customer forecast to cover the next 40 years (e.g. amortization period for the proposed pipeline) related to customers that would be served by the Panhandle system? If yes, please provide a copy.

1-PP-5

Reference: “The Project as proposed is designed to reliably serve increased demands for firm service in the Panhandle Market, including, in particular, incremental demands from the greenhouse, automotive, and power generation sectors.” [A/2/1 Page 2]

- a) What is the current peak demand (GJ) for the Panhandle system and what will be the peak demand capacity if the project is approved and completed.
- b) Please provide a copy of all firm contracts and firm commitments from greenhouse, automotive, and power generation sectors customers that drive the incremental peak demand identified.
- c) Please provide a table showing each customer incremental natural gas peak demand that would be supplied by the proposed pipeline and include columns indicating the start and end date for each firm contractual commitment related to those peak demand commitments.
- d) Please identify any additional peak demand capacity that the proposed project would provide in excess of the contracted demand identified.
- e) Please confirm that the Panhandle system has the capacity to provide for ex-franchise delivery (e.g. export) and what the capacity is available for ex-franchise deliver.

1-PP-6

Reference: “In total, 44 bid forms from interested parties were received, indicating over 318 TJ/d of interest for incremental firm and interruptible demand over the 2023-2033 period.” [B/1/1, Page 6]

- a) Please provide the breakdown of survey results by year from 2023-2033 with separate columns for incremental firm, incremental interruptible and incremental total.
- b) How many of the 44 survey respondents (by number and incremental PJ requirement) have entered into the 5 year contract commitments requested by Enbridge.

1-PP-7

Reference: “Natural gas plays a critical role in meeting the energy needs of the EV, EV battery and EV battery component manufacturing sector ...’ [B/1/1 Pg. 16]

Please explain the how natural gas is used in the creation of an EV and EV battery.

1-PP-8

References:

“203 TJ/d resulting from the Project will support the continued reliable and secure delivery of natural gas to the growing residential, commercial, and industrial customer segments within the Panhandle Market” [A/3/1 pg.3]

“Contract rate customer demand makes up approximately 98% of the capacity of the proposed Project.” [B/1/1 Pg.7]

- a) Please explain how 98% of the project capacity is allocated to contract rate demand, and there can still be 203 TJ/d of additional unallocated future capacity left from the proposed project.
- b) Please explain how the 203 TJ/d of additional unallocated future capacity will be used until it is needed in the future to serve in-franchise customers. Also, if it is idle capacity not planned to be used, please indicate.

1-PP-9

Please provide all reports, presentations and related materials that support that Panhandle system demand will exceed capacity by 31 TJ/d beginning in Winter 2023/2024 and increasing to 192 TJ/d by Winter 2027/2028.

1-PP-10

Please confirm that Enbridge did not conduct a 40 year demand forecast to validate the peak demand capacity that would be provided by the project options consider and the proposed project. If Enbridge did conduct that analysis, please provide a copy.

1-PP-11

Please provide a copy of the ICF market outlook report referenced in B/3/1 Page 6.

1-PP-12

Reference: "The Panhandle System Design Day weather condition is a 43.1 Heating Degree Day ("HDD"), which represents an average daily temperature of -25.1 degrees centigrade." [B/2/1 Pg. 4]

- a) Please indicate how many days in the past 10 years the Panhandle System Design Day weather condition of 43.1 Heating Degree Day ("HDD") occurred.
- b) For cases in the past 10 years where the Panhandle System Design Day weather condition of 43.1 Heating Degree Day ("HDD") was reached or exceeded, please indicate what additional measures were taken to ensure adequate natural gas supply.

1-PP-13

Hydro One has also applied for a Leave to Construct (EB-2022-0157) to increase energy (natural gas) supply to south-western Ontario including many of the same customer needs. Please identify what coordination has been done to ensure that these independent projects are not duplicating energy supply to the same customers. If no coordination was done, please confirm.

2-PP-14

- a) Please list all municipal/community energy plans (or equivalent such as energy & emission plans, etc.) were considered when planning for this project.
- b) Please provide a copy of all DSM related options and analysis conducted to serve current and incremental customers served by the Panhandle system.

2-PP-15

Preference: "Enbridge Gas identified several facility alternatives and IRPAs to meet the identified system need". [C/1/1 Pg.5]

- a) Please provide a list of the stakeholders consulted during the facility alternative and IRPA identification and assessment.
- b) Please provide a copy of the input/comments provided by stakeholders during the facility alternative and IRPA identification and assessment. For each input/comment received, please explain how it was considered in the process.

2-PP-16

Reference: "Enbridge Gas has completed an alternatives assessment to determine the optimal solution to meet the identified system need" [C/1/1 Pg. 3]

Please provide a copy of all materials (e.g. reports, presentations, correspondence, etc. related to the alternatives assessment.

2-PP-17

Reference: "The proposed Project provides many benefits and is the best alternative for meeting the identified needs for the following reasons" [C/1/1 Pg. 24]

Please provide a table identifying each option/alternative considered and indicate what the relative impact/rating was for each of the following criteria used by Enbridge for decision making.

- Lowest cost per unit of capacity
- Meets required November 1, 2023 in-service date
- Provides market assurance in meeting the growing firm demands along the Panhandle System for the next five year
- Increases Ontario customers access to diverse supply, storage, and price transparency of the Dawn Hub
- Provides load balancing between existing laterals to reduce the pressure drop between the NPS 20 Panhandle Line and the Leamington-Kingsville market, which also allows for incremental growth throughout the entire Panhandle Market.
- Scalable with system growth.
- Directly feeds area of growth.
- Contains the lowest risk relative to other alternatives assessed.
- Contains the lowest environmental and socio-economic impacts relative to all viable alternatives assessed.

2-PP-18

Reference: Posterity Report [C/1/1, Attachment 2]

- a) Please provide the RFP (if applicable), statement of work and contract with Posterity Group for the IRP analysis and report.
- b) Is the 2 page report filed the only material received from Posterity Group related to this project? If no, please provide all other materials (reports, presentations, emails, etc.).

2-PP-19

Reference: "The total gross cost of the approximately 6,900 m³/hr of potential reduction that could be obtained by winter 2029/2030 would be approximately \$50 million".
[Posterity Report C/1/1, Attachment 2, Page 1]

Please provide a similar model reduction estimate for the following DSM cost ranges.

- \$100 million
- \$200 million
- \$300 million

3-PP-20

Enbridge is currently coordinating its rebasing application for 2024. Please explain how this project relates (if at all) with rebasing.

4-PP-21

Please confirm that the Environmental Report only assessed the proposed pipeline option selected by Enbridge and did not compare the other alternatives identified in the Leave to Construct application. If that is incorrect, please provide the references to where all project alternatives were compared from an Environmental and Socio-economic perspective.

4-PP-22

Has Enbridge received the final review and approval letter from TSSA? If not, please indicate when it is expected.

4-PP-23

Please provide an updated project schedule including major milestones including permits and approvals.